

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2000-0036-T

IN RE:

Petition of the Office of Regulatory)	
Staff to Revoke the Charter Bus)	
Certificate of Albertha Cohen)	MOTION FOR IMMEDIATE
and Richard Taylor d/b/a Taylor Tours)	SUSPENSION OF CERTIFICATE
For Failure to Maintain and File)	OF PUBLIC CONVENIENCE AND
Evidence of Insurance)	NECESSITY

The Office of Regulatory Staff, by the filing of this Motion would respectfully show and request of the Commission:

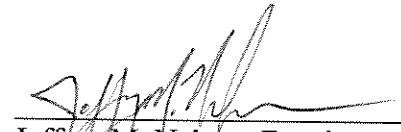
1. That contemporaneously with this Motion, the Office of Regulatory Staff (“ORS”) did file with the Commission a Petition For Rule to Show Cause in the above captioned matter requesting the Commission to schedule a formal administrative hearing to revoke the Charter Bus Certificate of Albertha Cohen and Richard Taylor d/b/a Taylor Tours (herein “Taylor Tours” or “the Company”) See Attachment A, Charter Bus Certificate issued by the Commission to **ALBERTHA COHEN AND RICHARD TAYLOR D/B/A TAYLOR TOURS** on January 10, 2001.
2. That as shown in attachments to that Petition, the ORS evidenced that Lincoln General Insurance Company cancelled the motor carrier insurance policy of Taylor Tours effective June 28, 2006. See Attachment B, Form K.
3. That as a result of the receipt of the Form K on May 25, 2006, the ORS contacted **ALBERTHA COHEN AND RICHARD TAYLOR D/B/A**

TAYLOR TOURS requiring that the Company provide evidence of insurance to the ORS within thirty (30) days as **ALBERTHA COHEN AND RICHARD TAYLOR D/B/A TAYLOR TOURS** would no longer have insurance as required under S.C. Code Ann. §58-23-910 (Supp. 2004) on June 28, 2006. See Attachment B, Form K and Attachment C, Certified Letter of George Parker.

4. That in further support of this Motion, the ORS hereby provides as Attachment D the Affidavit of Jeanne Gordon evidencing that Taylor Tours has failed to respond or otherwise provide proof of insurance to the ORS since that date.
5. That the Commission's own regulations specifically provide that the mere failure of a company to file evidence of insurance is sufficient grounds for the suspension of a Charter Bus Certificate. As stated in 26 S.C. Code Regs. 103-175 (Supp. 2005) "Either a failure to file evidence of insurance or surety bond or failure to keep all insurance or bonds in full force and effect shall be just cause for the Commission **without further evidence or hearing**, to suspend its order granting authority or to suspend the certificate or any license issued to the motor carrier." (emphasis added). Further, 26 S. C. Code Regs. 103-240 (Supp. 2005) provides in relevant part that "this rule (providing for notice an opportunity to be heard) shall have no effect upon rules hereinbefore set forth which authorize suspension, revocation, alteration, or amendment of a certificate or of an existing order granting operating rights **without hearing** where certain conditions exist." (emphasis added).

6. That while this matter is awaiting a hearing before the Commission, such continued operation by Taylor Tours without any form of insurance is contrary to the public interest as an uninsured motor carrier may pose a threat to customers of the Company and the general public, who would be unaware of Taylor Tours's lack of insurance.

WHEREFORE, the ORS staff prays that this Honorable Commission immediately and without further evidence or hearing suspend, pursuant to 26 S.C. Code Regs. 103-175 (Supp. 2005), the Charter Bus Certificate, Number 0106-A, of **ALBERTHA COHEN AND RICHARD TAYLOR D/B/A TAYLOR TOURS** (issued under Order No. 2001-015 in Docket 2000-0036-T) and for such other appropriate action which the Commission may deem necessary and proper.



Jeffrey M. Nelson, Esquire
Nanette S. Edwards, Esquire
Office of Regulatory Staff
PO Box 11263
Columbia, SC 29211

September 6, 2006
Columbia, SC



Public Service Commission of South Carolina
Columbia, South Carolina

CLASS C – Charter Bus

Docket No. 2000-0036-T

Order No. 2001-015

Certificate No. 0106-A

CHARTER BUS CERTIFICATE

NAME: Albertha Cohen and Richard Taylor DBA **TAYLOR TOURS**

ADDRESS: 2463 Bohicket Road, Johns Island, SC 29455

a charter bus passenger service, by means of motor propelled vehicles, has furnished evidence of compliance with regard to minimum amounts of financial responsibility relating to insurance requirements and safety requirements of the South Carolina Department of Public Safety.

BETWEEN POINTS AND PLACES IN SOUTH CAROLINA

COPY

Neither this Certificate nor the rights granted herein shall be sold, assigned, leased, transferred, mortgaged, pledged, or otherwise hypothecated, unless first approved by the Commission.

DATED at Columbia, South Carolina, this 10th day of January

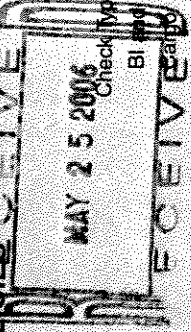
A.D., 2001.

Executive Director

Chairman

UNIFORM NOTICE OF CANCELLATION OF
MOTOR CARRIER INSURANCE POLICIES
(Executed in Triplicate)

SC



Filed with OFFICE OF REGULATORY STAFF

(Name of Commission)

(hereinafter called Commission)

This is to advise that under the terms of a policy or policies issued to:

ALFRED A. COHEN AND RICHARD TAYLOR DBA: TAYLOR TOURS

(Name of Motor Carrier)

of 2463 BOHICKET ROAD, JOHN ISLAND, SC 29455

(Address of Motor Carrier)

by LINCOLN GENERAL INSURANCE COMPANY

(Name of Company)

of 3350 WHITEFORD ROAD, P.O. BOX 3709 YORK, PENNSYLVANIA 17402-0136

(Address)

said policy or policies, including any and all endorsements forming a part thereof or certificates issued in connection therewith, is (are) hereby cancelled effective as of the 28 day of JUNE, 2006, 12:01 A. M., standard time at the address of the insured as stated in said policy or policies provided such date is not less than thirty (30) days after the actual receipt of this notice by the Commission.

Insurance Company File No. LPA101795-02

(Policy Number)

Robert C. Kins

(Signature of Insurer)

5/23/06

C. DUKES SCOTT
EXECUTIVE DIRECTOR

P.O. Box 11263
Columbia, S.C. 29211



Phone: 803-737-0800
Fax: 803-737-0801

DAN F. ARNETT
CHIEF OF STAFF

KATIE C. MORGAN
DIRECTOR
TELECOMMUNICATIONS, TRANSPORTATION, WATER/WASTEWATER

MAY 25, 2006

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ALBERTHA COHEN AND RICHARD TAYLOR DBA
TAYLOR TOURS
2463 BOHICKET ROAD
JOHNS ISLAND, SC 29455

RE: Public Service Commission Required Intrastate Insurance Filing

Dear Sir/Madam:

Pursuant to S.C. Code Regs 103-170.1, all motor carriers regulated by the Public Service Commission must file evidence of current insurance.

The Office of Regulatory Staff has received the following notice affecting your current insurance coverage:

Insurance Type:	Public Liability and Property Damage Insurance Policy No LPA101795-02
Issued by:	LINCOLN GENERAL INSURANCE COMPANY
Will be:	<u>CANCELLED EFFECTIVE 6/28/06 at 12:01 a.m.</u>

To remain in compliance with the Public Service Regulations, it is necessary that you file proof of current insurance coverage with the Office of Regulatory Staff prior to the above listed cancellation date. Proof of insurance can be mailed or faxed to:

State of South Carolina
Office of Regulatory Staff
Transportation Department
PO Box 11263
Columbia, SC 29211
Fax number: 803/737-0801

If you fail to provide this information, you are ordered and directed to cease operations as of the above cancellation date.

Operation without proper insurance is a violation of the law and you will be subject to all penalties as outlined in the S.C. Code of Law and Regulations.

Please contact the Transportation Department with any questions at 803/737-0800.

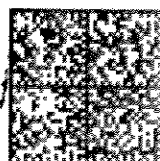
Sincerely,

L. George Parker
Program Manager
Transportation Department

CERTIFIED MAIL™

State of South Carolina
Office of Regulatory Staff
PO Box 11263
Columbia, SC 29211

7005 0390 0002 6160 0265



UNITED STATES POSTAGE
\$04.64
02 1A
0004367136 MAY 31 2006
MAILED FROM ZIP CODE 29201

UNCLAIMED

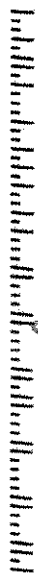
ALBERTHA COHEN AND RICHARD
TAYLOR DBA
TAYLOR TOURS
2463 BOHICKET ROAD
JOHNS ISLAND, SC 29455

UNCLAIMED
CHAS SC 29423

1st NOTICE
2nd NOTICE
RETURNED

UNC

29455+3316-63 R017



BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2000-0036-T

August 17, 2006

IN RE: Petition of the Office of Regulatory)
Staff to Revoke Certificates of) **AFFIDAVIT OF**
Public Convenience and) **Jeanne Gordon**
Necessity of Certain Motor Carriers)

The Affiant, after having been first duly sworn, deposes and states as follows:

- 1) My name is Jeanne Gordon and I am employed by the Office of Regulatory Staff ("ORS") as Program Specialist for the Transportation Department.
- 2) My office is located at 1441 Main Street, Columbia, South Carolina, 29201 (Mailing Address: Post Office Box 11263, Columbia, South Carolina 29201).
- 3) My duties and responsibilities as Program Specialist for ORS include serving as custodian of records for business filings associated with motor vehicle carriers subject to the jurisdiction of the Public Service Commission ("PSC").
- 4) It is the regular business practice of ORS to maintain certain business records required to be filed by motor vehicle carriers that are subject to the jurisdiction of the PSC.
- 5) As a result of my duties and responsibilities, I have knowledge of the manner in which the books and records are kept and of any books or records which are not complete or which are not on file with ORS.
- 6) On June 28, 2006, I examined the business records on file with ORS.
- 7) I attest that the proof of insurance as required by 26 S.C. Code Regs 103-171 has not been filed with ORS by the following company as of August 15, 2006:

Albertha Cohen and Richard Taylor dba Taylor Tours 2463 Bohicket Road Johns Island, SC 29455

AND FURTHER THE AFFIANT SAYETH NOT.

Jeanne Gordon

Jeanne Gordon
Program Specialist, Transportation Department
Office of Regulatory Staff
P.O. Box 11263
Columbia, South Carolina 29211

Sworn and subscribed before me
this 16 day of August, 20 06

Susan Hauptman
Notary Public for South Carolina

My Commission Expires: 08-17-07